

1 DANIEL G. BOGDEN
United States Attorney
District of Nevada
2 KATHRYN C. NEWMAN
Assistant United States Attorney
3 333 Las Vegas Boulevard South
Suite 5000
4 Las Vegas, Nevada 89101
702-388-6336
5 Fax: 702-388-5087

6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 -oOo-

9 UNITED STATES OF AMERICA,) Case No.: 2:13-cr-00440-JCM-VCF
10 Plaintiff,) **STIPULATION FOR PROTECTIVE ORDER**
11 vs.)
12 MARIA LUZ GARCIA,)
13 Defendant.)
14)

15 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
16 United States Attorney for the District of Nevada, Kathryn C. Newman, Assistant United States
17 Attorney, and Maria Luz Garcia, and her counsel, Heidi Ojeda, Assistant Federal Public
18 Defender, that this Court issue an Order protecting from disclosure to the public any discovery
19 documents containing the personal identifying information such as social security numbers,
20 drivers license numbers, dates of birth, or addresses of participants, witnesses and victims in
21 this case. Such documents shall be referred to hereinafter as "Protected Documents." The
22 parties state as follows:
23
24

1 1. Discovery in this case is voluminous. Many of the documents include personal
2 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would
3 prevent the timely disclosure of discovery to defendants.

4 2. The United States agrees to provide Protected Documents without redacting the
5 personal identifiers of participants, witnesses, and victims.

6 3. Access to Protected Documents will be restricted to persons authorized
7 (authorized person) by the Court, namely the defendant, attorney(s) of record and attorneys'
8 paralegals, investigators, experts, secretaries, file clerks, law clerks, contractors, vendors, IT
9 Department, and copy centers employed by the attorney(s) of record or performing on behalf of
10 defendant.

11 4. The following restrictions will be placed on defendant, defendant's attorney(s)
12 and the above-designated individuals unless and until further ordered by the Court. Defendants,
13 defendants' attorneys and the above-designated individuals shall not:

- 14 a. make copies of the Protected Documents for, or allow copies of any kind of the
15 Protected Documents be made for, any person that is not an authorized person;
16 b. allow any other person to read the Protected Documents; and,
17 c. use the Protected Documents for any other purpose other than preparing to
18 defend against the charges in the Superseding Indictment or any further
19 superseding indictment arising out of this case.

20 5. Defendant's attorney(s) shall inform any person to whom disclosure may be
21 made pursuant to this order of the existence and terms of this Court's order.

22 6. The restrictions shall not restrict the use of Protected Documents during the trial
23 of or judicial proceedings in this matter.
24

7. At the conclusion of this action, defense counsel shall return to government counsel or destroy and certify to government counsel the destruction of all copies of Protected Documents in defense counsel's possession, including copies of Protected Documents previously in the possession of all authorized persons and returned to defense counsel. This action will be deemed concluded after the completion of the final appeal in this matter, or if no appeal was filed, then the expiration of the statute of limitations for the filing of any final appeal of any matter, including collateral review.

DANIEL G. BOGDEN
United States Attorney

/s/ Kathryn C. Newman
KATHRYN C. NEWMAN
Assistant United States Attorneys

January 7, 2014
DATE


HEIDI OJEDA, AFPD
Counsel for Maria Luz Garcia

1/14/2014
DATE


MARIA LUZ GARCIA

1/14/2014
DATE

ORDER

IT IS SO ORDERED this 15th day of January, 2014.


UNITED STATES DISTRICT JUDGE
Magistrate